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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CANA FOUNDATION, a non-profit  
corporation, LAURA LEIGH, individually,  
and WILD HORSE EDUCATION, a non-  
profit corporation,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
INTERIOR, BUREAU OF LAND  
MANAGEMENT, and JON RABY, Nevada  
State Director of the Bureau of Land  
Management,

Defendants.

CASE NO. 2:22-cv-01200

**NOTICE OF WITHDRAWAL OF  
PLAINTIFFS' MOTIONS FOR  
TEMPORARY RESTRAINING ORDER  
AND PRELIMINARY INJUNCTION**

Complaint Filed: July 26, 2022  
Hearing: August 12, 2022 at 2:00 pm PDT

1 On August 7, 2022, the Bureau of Land Management (“BLM”) concluded its roundup of  
 2 burros at the Blue Wing Complex, so Plaintiffs have sent their observers to other roundup/gather  
 3 events being conducted by BLM.<sup>1</sup> Plaintiffs CANA Foundation, Laura Leigh, and Wild Horse  
 4 Education therefore withdrawal their motions for temporary restraining order (ECF No. 10) and  
 5 preliminary injunction (ECF No. 16) seeking meaningful observation and access to the gather of  
 6 burros at the Blue Wing Complex from Defendants BLM and Jon Raby, in his official capacity  
 7 as the Nevada State Director of the BLM. Undersigned counsel has conferred with Defendants,  
 8 and they do not object to Plaintiffs’ withdrawal of their motions for emergency injunctive relief.  
 9

10 We respectfully ask the Court to withdrawal Plaintiffs’ motions for temporary restraining  
 11 order (ECF No. 10) and preliminary injunction (ECF No. 16) and to take the hearing scheduled  
 12 for August 12, 2022 at 2:00 pm PDT (ECF No. 18) off calendar.

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 14 DATED: August 10, 2022

Respectfully Submitted,

15 /s/ Alexandra J. Monson

16 Jessica L. Blome

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 24 <sup>1</sup> See Bureau of Land Management, *2022 Blue Wing Complex Wild Horse and Burro Gather*  
 25 (updated Aug. 9, 2022), [https://www.blm.gov/programs/wild-horse-and-burro/herd-](https://www.blm.gov/programs/wild-horse-and-burro/herd-management/gathers-and-removals/nevada-humboldt-fo/2022-blue)  
 26 [management/gathers-and-removals/nevada-humboldt-fo/2022-blue](https://www.blm.gov/programs/wild-horse-and-burro/herd-management/gathers-and-removals/nevada-humboldt-fo/2022-blue) (showing that by August 7th,  
 the BLM completed the gather of 805 burros).

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